

# Exhibit C

<p style="text-align: center;">1 UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION Case No. 1:16-cv-20194-GAYLES</p> <p style="text-align: center;">2 LYNN McCULLOUGH and WILLIAM McCULLOUGH,</p> <p style="text-align: center;">3 Plaintiffs,</p> <p style="text-align: center;">4 vs.</p> <p style="text-align: center;">5 ROYAL CARIBBEAN CRUISES, LTD.; RAINFOREST ADVENTURES (HOLDINGS), LTD.; ELITE SHORE EXCURSIONS FOUNDATION; RAINFOREST SKY RIDES, LTD.; RAINFOREST TRAM, LTD.; et al.,</p> <p style="text-align: center;">6 Defendants. _____ 7 VOLUME II 8 VIDEOTAPED DEPOSITION OF 9 HARALD JOACHIM VON DER GOLTZ 10 Taken on Behalf of Plaintiffs 11 Monday, March 6th, 2017 12 1:31 p.m. - 2:28 p.m. 13 2 Biscayne Boulevard, Suite 1750 14 Miami, FL 33131</p>	<p style="text-align: center;">1 2 For Harald Joachim von der Goltz: 3 MARCUS, NEIMAN &amp; RASHBAUM, LLP 4 100 Southeast Third Ave, Suite 805 5 Fort Lauderdale, Florida 33394 6 By MATTHEW CHAVES, ESQUIRE 7 By JEFFREY NEIMAN, ESQUIRE 8 ALSO PRESENT: 9 Marcio Martinez, Videographer 10 Above and Beyond Reprographics</p>
<p style="text-align: center;">1 2 Examination of the witness taken before 3 Sonja D. Hall 4 Palm Beach Reporting Service, Inc. 5 1665 Palm Beach Lakes Boulevard, Suite 1001 West Palm Beach, FL 33401 (561) 471-2995</p> <p style="text-align: center;">6 APPEARANCES:</p> <p style="text-align: center;">7 For Plaintiffs:</p> <p style="text-align: center;">8 SEARCY, DENNEY, SCAROLA, BARNHART &amp; SHIPLEY, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 By JOHN JACK SCAROLA, ESQUIRE By BERNARD O'DONNELL, ESQUIRE</p> <p style="text-align: center;">9 For Defendants Rainforest Adventures (Holdings), Ltd.; Elite Shore Excursions Foundation; Rainforest Sky Rides, Ltd.; Rainforest Tram, Ltd.: COLE, SCOTT &amp; KISSANE, P.A. 9150 South Dadeland Boulevard, Suite 1400 Miami, FL 33156 By STEVEN SAFRA, ESQUIRE By WARREN CHIN, ESQUIRE (Telephonically)</p> <p style="text-align: center;">10 For Defendant Royal Caribbean Cruises, Ltd.: MASE TINELLI 2601 S. Bayshore Drive, Suite 800 Miami, FL 33133 By WILLIAM R. SEITZ, ESQUIRE (Telephonically)</p> <p style="text-align: center;">11 For Defendant Andrew Pierce and AP Electrical: LITCHFIELD CAVO LLP 600 Corporate Drive, Suite 600 Fort Lauderdale, FL 33334 By MARCI STRAUSS, ESQUIRE</p>	<p style="text-align: center;">1 2 I N D E X 3 Videotaped Deposition of Harald J. von der Goltz Page No. 4 Direct Examination by Mr. Scarola 6 5 Certificate of Oath 6 Certificate of Reporter 7 Read &amp; Sign Letter to Witness 8 9 PLAINTIFFS' EXHIBIT INDEX 10 11 No. Description Page No. 12 118 New York Times Article - Panama Papers 8 13 14 15 * * * * 16 17 18 DEFENDANTS' EXHIBIT INDEX 19 (No exhibits were marked.) 20 21 22 23 24 25</p>

1           THE VIDEOGRAPHER: We are now on the  
 2       video record. Today's date is March 6th of  
 3       2017. The time is approximately 1:31 p.m.  
 4           This is the videotaped deposition of  
 5       Harald von der Goltz.  
 6           MR. SCAROLA: My name is Jack Scarola  
 7       along with Bernie O'Donnell. We represent  
 8       Mr. and Mrs. McCullough, the plaintiffs in  
 9       this action sags.  
 10          MR. SAFRA: Steven Safra and Warren  
 11       Chin on behalf of the witness,  
 12       Mr. von der Goltz, as well as what's  
 13       referred to in the complaint as the  
 14       collectively as the Rainforest defendants,  
 15       and John Dalton.  
 16          MR. NEIMAN: Jeffrey Neiman and Matt  
 17       Chaves on before of Mr. von der Goltz,  
 18       individually.  
 19          MS. STRAUSS: Marci Strauss on behalf  
 20       of AP Electrical and Andrew Pierce.  
 21          MR. SEITZ: Bill Seitz on behalf of  
 22       Royal Caribbean.

23  
 24  
 25

1       THEREUPON,

2           HARALD JOACHIM VON DER GOLTZ,  
 3       being a witness in the notice heretofore  
 4       filed, and being first duly sworn in the above cause,  
 5       testified on his oath as follows:

6           THE WITNESS: Yes, ma'am.

7           DIRECT EXAMINATION

8       BY MR. SCAROLA:

9           Q     Mr. von der Goltz, you understand that we  
 10      are here for purposes of spending an additional 45  
 11      minutes, pursuant to court order, to complete your  
 12      deposition, which was begun earlier with regard to  
 13      matters of jurisdiction, correct, sir?

14          A     Yes. I understand that's what the reason is  
 15      for these 45 minutes.

16          Q     All right, sir.

17          Have you done anything to prepare for this  
 18      session?

19          A     Yes.

20          Q     What have you done?

21          A     I basically --

22          MR. SAFRA: Don't get into  
 23      conversations with your attorney, but you  
 24      can otherwise say. Don't get into anything  
 25      we talked about.

5

1           THE WITNESS: No, but I did read, for  
 2       example, these documents.

3       BY MR. SCAROLA:

4           Q     And those documents are which documents,  
 5       sir?

6           A     They are the documents -- I don't really know  
 7       very well how to describe them legally. I guess  
 8       certificate of service.

9           Q     There is title in bold near the bottom  
 10      third of that document.

11          A     Defendant Harald von der Goltz's Responses  
 12      and Objections to Plaintiff's Jurisdictional  
 13      Interrogatories.

14          Q     All right, sir. What else did you review?

15          A     And the other one is this. And --

16          Q     I'm sorry. I don't know what this is.

17          A     This is also objections to request to produce  
 18      documents, I guess.

19          Q     And did you review any other documents.

20          A     Yes. I also read the -- I reviewed the  
 21      Panama Papers.

22          Q     When you say you reviewed the Panama  
 23      Papers, did you review the papers themselves, or did  
 24      you review news accounts of the contents of those  
 25      papers?

6

8

1       A     I just read the news account of the Papers.

2       Q     Are you referring particularly to what I  
 3       have marked as Exhibit Number 118 and handed to you  
 4       just a moment ago?

5       A     Yes, sir.

6           (Plaintiff's Exhibit Number 118 was  
 7       marked for identification.)

8       BY MR. SCAROLA:

9           Q     Is that the first time that you had  
 10      reviewed that New York Times article, that is, the  
 11      first time in preparation for this deposition, or had  
 12      you seen it earlier?

13          A     I saw it after it was published in the New  
 14      York Times.

15          Q     How many times have you read that document?

16          A     One more time.

17          Q     You saw it when it was published; you read  
 18      it one more time in preparation for today's  
 19      deposition?

20          A     Correct.

21          Q     Is that correct?

22          A     Uh-huh.

23          Q     In reading through that document, to the  
 24      extent that the document makes any reference to you  
 25      whatsoever, did you note any inaccuracies in the New

<p style="text-align: center;">9</p> <p>1 York Times' account?</p> <p>2 A Yes, sir. I think it's all inaccurate.</p> <p>3 Q So there is -- I'm sorry.</p> <p>4 A It's inaccurate.</p> <p>5 Q And you said specifically that it is all</p> <p>6 inaccurate, is that correct, as it relates to you?</p> <p>7 A I want to just state that, as a -- in my</p> <p>8 capacity as an advisor to EMJO, there are -- the</p> <p>9 document that I have been presented with and I have</p> <p>10 read is not accurate. I can't say it's not accurate in</p> <p>11 all cases, but it is not accurate.</p> <p>12 Since this was based on a document that I</p> <p>13 had never seen, I had nothing to do with it. I</p> <p>14 never read it. I saw the article that was written</p> <p>15 by the New York Times. Obviously, got information</p> <p>16 that I had never seen. It's totally foreign to me</p> <p>17 and I don't know really what -- where they got these</p> <p>18 contents from.</p> <p>19 Q Turn, if you would, please, to --</p> <p>20 unfortunately the pages are not numbered -- but about</p> <p>21 a little more than halfway through the document a</p> <p>22 heading that reads, "Live This Potential Risk" that</p> <p>23 is in enlarged type?</p> <p>24 A Yes, I see it.</p> <p>25 Q Do you see that section?</p>	<p style="text-align: center;">11</p> <p>1 observing those rules, okay?</p> <p>2 Yes? Is that all right?</p> <p>3 A Yes, sir.</p> <p>4 Q Thank you.</p> <p>5 I asked you whether there was anything</p> <p>6 inaccurate about the references in this article to</p> <p>7 you, and your response was that it is all</p> <p>8 inaccurate. Is that still your response?</p> <p>9 A No, it is not.</p> <p>10 Q So there are portions of this that are</p> <p>11 accurate; is that correct?</p> <p>12 A Yes, sir.</p> <p>13 Q For example, where it says that, For more</p> <p>14 than 30 years as the founder of Boston Capital</p> <p>15 Ventures, Harald Joachim von der Goltz has built a</p> <p>16 reputation as a savvy investor in emerging companies.</p> <p>17 That's an accurate statement, is it not?</p> <p>18 A Yes.</p> <p>19 Q You also sought and received help from the</p> <p>20 law firm Mossack Fonseca, did you not?</p> <p>21 MR. SAFRA: Objection, form.</p> <p>22 THE WITNESS: I did not receive help</p> <p>23 and -- as a capacity of a Boston Capital</p> <p>24 Ventures partner, I never received any help</p> <p>25 or assistance from Mossack Fonseca.</p>
<p style="text-align: center;">10</p> <p>1 A Yes, sir.</p> <p>2 Q We can agree that that's the section that</p> <p>3 relates specifically to you, correct?</p> <p>4 A I presume that it goes -- I haven't seen the</p> <p>5 end of it, but -- there is the no other heading after</p> <p>6 that, so I don't know if it involves just me and my</p> <p>7 family or not.</p> <p>8 Q Well, you do agree that you are referenced</p> <p>9 in the section --</p> <p>10 A Yes, sir.</p> <p>11 Q -- that reads "Live This Potential Risk,"</p> <p>12 correct?</p> <p>13 A Yes, I agree that it references me.</p> <p>14 Q It is your testimony that there's nothing</p> <p>15 in that section that is accurate? Is that true?</p> <p>16 A No. I didn't say that.</p> <p>17 Q Oh, I am sorry. I thought that is what you</p> <p>18 said.</p> <p>19 I asked you if there was anything</p> <p>20 inaccurate about --</p> <p>21 Excuse me, sir. I'm sorry, but if you</p> <p>22 remember -- and we talked about these rules a little</p> <p>23 bit earlier -- you need to wait until I finish my</p> <p>24 question, and I need to wait until you finish your</p> <p>25 answer. So we will do the best we can to go back to</p>	<p style="text-align: center;">12</p> <p>1 BY MR. SCAROLA:</p> <p>2 Q No, sir. That was not my question.</p> <p>3 My question was did you seek the legal</p> <p>4 assistance of Mossack Fonseca?</p> <p>5 A No, I did not, sir.</p> <p>6 Q You have never had them as your lawyers; is</p> <p>7 that accurate?</p> <p>8 A I have had them as the lawyers, but I did not</p> <p>9 seek any support from them in this context.</p> <p>10 Q Well, I am not sure what context you mean.</p> <p>11 My only question to you was, was the law firm Mossack</p> <p>12 Fonseca a law firm that provided legal help to you?</p> <p>13 MR. SAFRA: Objection, form. Context</p> <p>14 is in the document that is being shown and</p> <p>15 asked about.</p> <p>16 THE WITNESS: In what respect would you</p> <p>17 want to spec -- specifically say that they</p> <p>18 would -- that you want to know in what sense</p> <p>19 they gave me some legal advice?</p> <p>20 BY MR. SCAROLA:</p> <p>21 Q All I want to know is whether they were or</p> <p>22 were not your lawyers.</p> <p>23 A In general or specifically?</p> <p>24 Q With regard to anything.</p> <p>25 A They were never my personal lawyers, no.</p>

13

1 Q Did they represent any business entity with  
2 which you were associated?

3 A Yes, they did.

4 Q Which business entities did they represent?

5 A They represented Rain Forest Adventures and  
6 they also represented EMJO Investments.

7 Q Have they represented any other business  
8 entities with which you have had any connection?

9 A Right now, except for Revack Holdings, which  
10 is a company that -- the entity that owns EMJO, I can't  
11 think of -- oh -- no, I don't think that they  
12 represented anybody else. I'm not 100 percent sure.  
13 Maybe Coral Reef Adventures, but I am not 100 percent  
14 sure about that.

15 Q Those that you are sure of are Rain Forest  
16 Adventures (Holdings), EMJO and Revack; is that  
17 correct?

18 A Yes.

19 Q What was the nature of the services that  
20 that law firm provided for Rain Forest Adventures?

21 A They were the lawyers for the company. They  
22 were corporate services regarding the -- the different  
23 companies that were established, I believe, in the  
24 British Virgin Islands. And they represented the  
25 company from the legal perspective.

15

1 making a decision.

2 Q I don't understand that answer.

3 Did there come a point in time when your  
4 mother lacked the capacity to be able to make  
5 business decisions on her own?

6 MR. SAFRA: Objection, form.

7 THE WITNESS: I think my mother was  
8 never a businesswoman, so clearly she was  
9 not a person -- she trusted her advisors.

10 And based on the advice she got, she would  
11 then support those decisions, but she was --

12 Q Did --

13 MR. SAFRA: You can finish your answer.

14 BY MR. SCAROLA:

15 Q You can finish. I didn't mean to interrupt  
16 you. I thought you had finished.

17 A So, she did not, let's say, make decisions on  
18 her own, but relied on the advice she got from her  
19 counsel or advisors that she employed when these  
20 decisions were made.

21 Q Was Mossack Fonseca ever given the  
22 authority to make decisions on behalf of your mother  
23 with regard to investments?

24 A I don't know that.

25 Q Were you ever given the authority to make

14

1 Q What was the nature of services they  
2 provided to EMJO?

3 A They were -- Mossack Fonseca was a legal  
4 representative to EMJO, and they were the ones who were  
5 deciding on the investments that EMJO would make for my  
6 mother.

7 Q So they had final decision-making authority  
8 with regard to where EMJO's money was invested?

9 A After discussions with my mother, yes.

10 Q When your mother reached the point,  
11 whereas, you told us earlier, she was incapable of  
12 making business decisions herself, was the  
13 responsibility for making those decisions  
14 entrusted to EM -- excuse me -- entrusted to Mossack  
15 Fonseca?

16 MR. SAFRA: Objection.

17 Mischaracterization of the testimony.

18 THE WITNESS: I don't think I said that  
19 my mother was -- what's the word you used?

20 BY MR. SCAROLA:

21 Q Incapable of making her own business  
22 decisions.

23 A Well, I don't think my mother ever was a  
24 businesswoman, so it was related more to business-type  
25 decisions, rather than incompetent or incapable of

16

1 decisions on behalf of your mother with regard to  
2 investments?

3 A No.

4 Q Did you ever communicate to Mossack Fonseca  
5 decisions as to how investments were to be made on  
6 behalf of EMJO?

7 A My only capacity was as an advisor.

8 Obviously, I gave some advice to Mossack Fonseca. In  
9 this case, usually through my financial advisor, Dick  
10 Gaffey, who then communicated with Mossack Fonseca.  
11 And that advice was either taken or not. And then  
12 Mossack Fonseca made, basically, the final decision on  
13 the investment.

14 Q Who gave Mossack Fonseca the final  
15 decision-making authority?

16 A My mother.

17 Q How did she communicate that?

18 A I don't know. I think verbally or -- I just  
19 don't know. But I think probably verbally.

20 Q When did you first learn that Mossack  
21 Fonseca had been given final decision-making  
22 authority with regard to investments to be made on  
23 behalf of EMJO?

24 A I don't remember the time.

25 Q How old was your mother when she gave

17

1 Mossack Fonseca final decision-making authority?

2 A Oh, she must have been 80 or something like

3 that.

4 Q So they have had that authority for more

5 than 20 years; is that correct?

6 A Yes, sir.

7 Well, not Mossack Fonseca, but -- 20 years

8 ago it was Mossack Fonseca, and then afterwards it

9 was relayed to Mr. Ramses Owens.

10 Q When was the final decision-making

11 authority transferred from Mossack Fonseca to Ramses

12 Owens?

13 A It was, I believe, 2010 or so. 2009/2010.

14 Q To your knowledge, did Mossack Fonseca ever

15 register you as a resident of Guatemala?

16 A I don't know about that.

17 Q Did you ever make any effort to determine

18 whether Mossack Fonseca had registered you as a

19 citizen of -- as a resident of Guatemala?

20 A No.

21 Q When you read this account in the New York

22 Times that says that Mossack Fonseca registered you

23 as a resident of Guatemala, did you do anything about

24 that? Did you respond to that in any way?

25 A No, I have not responded. I was very upset

19

1 Guatemala?

2 MR. SAFRA: Object to form.

3 THE WITNESS: I didn't think it was

4 going to be -- I didn't even know who I

5 would be able to contact at the firm

6 regarding these issues.

7 BY MR. SCAROLA:

8 Q Did you ever try?

9 A No, I did not.

10 Q You never were a resident of Guatemala

11 during this period of time, were you?

12 MR. SAFRA: Objection, form.

13 What period?

14 THE WITNESS: No, I was not.

15 BY MR. SCAROLA:

16 Q Have you ever been a resident of Guatemala?

17 A Yes.

18 Q When?

19 A Well, all my life, until I came -- moved to

20 the United States.

21 Q And when was that, sir?

22 A That was in the late -- mid- to late '80s.

23 Q And you have not been a resident of

24 Guatemala since the mid- to late '80s, correct?

25 A Correct.

18

1 about all the things I read there because they were not

2 true. And after this article appeared, I basically

3 have had very little -- I have had no contact with

4 Mossack Fonseca anymore.

5 Q Well, this is a statement which you have

6 told us you don't know whether it is true or not,

7 correct? You just said, I don't know if whether they

8 registered me as a resident of Guatemala.

9 A That's right. I didn't know that.

10 Q So when you read this in the New York

11 Times, not knowing whether it was true or not, didn't

12 you want to find out whether these lawyers had

13 improperly registered you as a resident of Guatemala?

14 MR. SAFRA: Objection, form.

15 THE WITNESS: Well, there was so many

16 points in here that were obviously not true

17 that I -- after what happened and those

18 publications, there was a big turmoil, from

19 what I understand, in the firm. So I don't

20 even know who I would have called to talk

21 about that.

22 BY MR. SCAROLA:

23 Q So it's your testimony that turmoil in the

24 law firm prevented you from making an inquiry as to

25 whether they had registered you as a resident of

20

1 Q Have you ever signed any documents

2 representing that you were a resident of Guatemala

3 after the mid- to late '80s when you moved to the

4 United States?

5 A I don't recall.

6 Q Did Mossack Fonseca attorneys ever talk to

7 you about risks involved in claiming that you were a

8 Guatemalan resident when you no longer were one?

9 A No, they didn't talk to me about that.

10 Q Did Ramses Owens ever talk to you about

11 registering you as a resident of Guatemala when you

12 were no longer a resident of Guatemala?

13 A No -- not that I can recall -- he didn't.

14 Q Did you, in fact, frequently transfer money

15 from offshore accounts to accounts in the United

16 States in order to fund investments for EMJO?

17 A Never.

18 Q Did you direct the transfer of funds from

19 offshore accounts to the United States to fund any

20 investments recommended by you?

21 A No.

22 Q Do you maintain offshore accounts, either

23 in your own name or in the name of any entity, in

24 which you have an ownership interest, either

25 registered or beneficial?

21

1 MR. SAFRA: Objection, form.  
 2 Outside the scope. It's dealing with  
 3 offshore accounts, other assets outside.  
 4 It's been brought up before the Court.  
 5 I will allow a little leeway to the  
 6 follow-up question.

7 Do you need to hear the question again?  
 8 I spoke for a minute. That's why.  
 9 THE WITNESS: The only account that I  
 10 have is a personal account offshore, which I  
 11 have in Germany.

12 BY MR. SCAROLA:

13 Q Do you maintain any bank accounts outside  
 14 the United States on behalf of any business entity  
 15 with which you have any connection?

16 A No.

17 Q Where is the German account maintained?  
 18 A At Warburg Bank in Hamburg.

19 Q Have you ever directed the transfer of any  
 20 money from the Warburg Bank in Hamburg to the United  
 21 States?

22 A No. I don't think so.

23 Q Have you ever discussed with any Mossack --  
 24 with any Mossack Fonseca attorneys efforts to avoid  
 25 the payment of United States taxes?

23

1 advisor to EMJO, you know, I recommended some  
 2 investments to be made.

3 But that to me is not a transfer of  
 4 assets. Transfer of assets would be, like,  
 5 transferring an investment from one place to  
 6 another. Is that what you're referring to or --

7 Q I am talking about moving money.

8 Have you directed the movement of money  
 9 from accounts belonging to your mother for any  
 10 purpose?

11 MR. SAFRA: Objection, form.

12 THE WITNESS: No, I have not.

13 BY MR. SCAROLA:

14 Q This article states, "In a 2008 email,  
 15 Mr. von der Goltz's Boston-based accountant asked  
 16 executives at Mossack Fonseca to wire money from  
 17 Mr. von der Goltz's mother, Erika."

18 A Uh-huh.

19 Q Are you aware of that happening?

20 A Is that the reference to the gift that my  
 21 mother gave me.

22 Q Yes, sir, the \$100,000 gift.

23 A Yes.

24 Q You are aware of that happening?

25 A Yes.

22

1 MR. SAFRA: Objection, form with regard  
 2 to privilege.

3 THE WITNESS: Never.

4 MR. SAFRA: Without waiver of privilege  
 5 I let him answer that question. Is that  
 6 okay, Jack?

7 MR. SCAROLA: I don't agree it's  
 8 privileged, pursuant to the crime fraud  
 9 exception.

10 But I understand that you have allowed  
 11 him to answer the question and reserve any  
 12 right you have to claim privilege.

13 MR. SAFRA: Exactly. Thank you.

14 BY MR. SCAROLA:

15 Q Have you ever directed the transfer of any  
 16 assets belonging to your mother through Mossack  
 17 Fonseca?

18 A No. Never.

19 Q Have you ever directed your accountant to  
 20 direct the transfer of assets belonging to your  
 21 mother for any purpose?

22 A Can you explain to me transfer of assets,  
 23 because obviously I don't understand that concept?

24 One thing is, let's say, to make an  
 25 investment, which obviously in my capacity as an

24

1 Q So that part of the article is accurate; is  
 2 that correct?

3 A Yes, sir.

4 Q Yes?

5 A Yes, sir, it is.

6 Q One of the names by which you are known is  
 7 Tica, T-I-C-A?

8 A Correct.

9 Q Have you ever discussed any effort to  
 10 shield your assets from liability with any Mossack  
 11 Fonseca agent?

12 MR. SAFRA: Objection, privileged.

13 THE WITNESS: No, I have never done  
 14 that.

15 BY MR. SCAROLA:

16 Q The portions of this New York Times article  
 17 that deal with you are on approximately three pages  
 18 that begin under the title "Live This Potential  
 19 Risk." And you said you have read this at least two  
 20 times before. And you told us initially that none of  
 21 it was accurate. Can you identify for us any  
 22 inaccurate portion in those three portions?

23 MR. SAFRA: Objection, form.

24 THE WITNESS: The second paragraph is  
 25 totally wrong.

25

1 BY MR. SCAROLA:  
 2 Q "For more than 30 years the founder of  
 3 Boston Capital Ventures" ...  
 4 A No, no, that's correct. The third paragraph.  
 5 Sorry.  
 6 "What few know, however, is that over  
 7 roughly that same span of time" ...  
 8 MR. SAFRA: Take your time.  
 9 BY MR. SCAROLA:  
 10 Q I think you have identified the paragraph.  
 11 A "What few know, however, is that over roughly  
 12 that same span of time and with the help of Mossack  
 13 Fonseca, Mr. von der Goltz has also come to command a  
 14 vast offshore empire: interconnected corporations,  
 15 foundations and bank accounts with about \$70 million in  
 16 assets, according to internal emails."  
 17 That is totally wrong. I was -- first of  
 18 all, my only role was as an advisor to EMJO. And I  
 19 never was a beneficiary of any of these entities.  
 20 It was always my mother.  
 21 And the number of -- that they mention  
 22 there is also invented. I don't know where they got  
 23 it from.  
 24 Q Well, do you know whether those statements  
 25 are an accurate reflection of internal Mossack

27

1 that very clearly that I do -- I have given advice to  
 2 EMJO, and, obviously, to my mother in my capacity as an  
 3 advisor to EMJO. I mean, that I have done.  
 4 Q You have told us that the third paragraph  
 5 of this article, the one that you just read to us --  
 6 A Exactly.  
 7 Q -- is not accurate.  
 8 A Correct.  
 9 Q And I am trying to determine what is not  
 10 accurate about the statements in that paragraph.  
 11 I understand that you challenge the  
 12 accuracy of the \$70 million number, correct?  
 13 A Yes, sir.  
 14 Q The rest of what is said there is accurate,  
 15 is it not?  
 16 MR. SAFRA: Object to the form.  
 17 THE WITNESS: I don't think so. It  
 18 says here, "Has come to command a vast  
 19 offshore empire."  
 20 I have never commanded an offshore  
 21 empire.  
 22 Interconnected corporations. I don't  
 23 know what they are talking about.  
 24 Foundations and bank accounts. It's  
 25 just totally false.

26

1 Fonseca emails?  
 2 A That I don't know. I have no way of knowing  
 3 that.  
 4 Q Well, one way of knowing it would be to ask  
 5 Mossack Fonseca, correct?  
 6 A Correct.  
 7 Q But you have never done that?  
 8 A No.  
 9 Q You do, in fact, have relationships with  
 10 interconnected corporations, foundations and bank  
 11 accounts, correct?  
 12 MR. SAFRA: Objection, form.  
 13 THE WITNESS: I didn't understand, sir  
 14 what that question was referring to.  
 15 BY MR. SCAROLA:  
 16 Q Do you, in fact, have relationships with  
 17 interconnected corporations, foundations and bank  
 18 accounts?  
 19 MR. SAFRA: Same objection.  
 20 THE WITNESS: I have relationships with  
 21 many things, but not related to this  
 22 particular -- to this particular article.  
 23 BY MR. SCAROLA:  
 24 Q Well, my question to you is --  
 25 A I mean, I mentioned to you -- I want to state

28

1 BY MR. SCAROLA:  
 2 Q Do you have a relationship with  
 3 interconnected corporations?  
 4 MR. SAFRA: Objection, form.  
 5 THE WITNESS: As an advisor or what?  
 6 BY MR. SCAROLA:  
 7 Q In any capacity, sir.  
 8 A Well, I am on the board of the foundation  
 9 that -- that helps to prevent blindness in Guatemala.  
 10 And my mother asked me to serve on that foundation,  
 11 so there I have a relationship.  
 12 I don't know any relationship to any bank  
 13 accounts or -- I don't know what the interconnected  
 14 corporations are. I just don't know.  
 15 Q Did EMJO pay for your daughter's education?  
 16 A It was my mother who paid for it.  
 17 Q With funds from EMJO?  
 18 A Yes, sir.  
 19 Q Did EMJO pay for your granddaughter's high  
 20 school tuition?  
 21 A Yes, it did.  
 22 Q Did you direct the transfer of funds from  
 23 EMJO to pay for your daughter's education?  
 24 MR. SAFRA: Objection form.  
 25 THE WITNESS: No, I did not.

29

1 BY MR. SCAROLA:

2 Q Were you involved in any way whatsoever in  
 3 communicating instructions that resulted in the  
 4 payment of your daughter's education by EMJO?

5 A Well, my mother, obviously, told me -- or I  
 6 discussed it with her. And one of the purposes or  
 7 goals of my mother is that both her grandchildren and  
 8 great grandchildren get a good education.

9 Q Were you involved in any way in  
 10 communicating instructions to transfer EMJO funds to  
 11 pay for your daughter's education?

12 A I communicated this -- what I discussed with  
 13 my mother to Mr. Gaffey.

14 Q Did you communicate instructions that EMJO  
 15 wire-transfer money to pay for your granddaughter's  
 16 high school tuition?

17 A I communicated that to -- after discussing  
 18 with my mother, I communicated it to Mr. Gaffey.

19 Q When was it that you gave the instructions  
 20 regarding your daughter's education? What year?

21 MR. SAFRA: Objection to form.

22 THE WITNESS: I don't remember. I  
 23 can't remember when that was. Obviously,  
 24 some time ago.

25

31

1 A No, I have not.

2 Q From the time that the Rain Forest  
 3 subsidiaries began operating until July of 2015, when  
 4 Mrs. McCullough suffered her catastrophic fall, did  
 5 your involvement with the subsidiaries change in any  
 6 significant way?

7 A In what sense?

8 Q From the time they began --

9 A I understand.

10 Q -- until Mrs. McCullough's catastrophe, did  
 11 your involvement with the subsidiaries change in any  
 12 significant way?

13 A Which subsidiaries would you be talking  
 14 about?

15 Q The Rain Forest subsidiaries.

16 A I was the director of Rain Forest Adventures,  
 17 and that's the role that I had -- basically, I had for  
 18 many years.

19 Q Yes, sir. You have in your earlier  
 20 testimony talked about the relationships that you  
 21 had, the functions that you performed, the people  
 22 with whom you interacted. And what I want to know  
 23 is, from the time the subsidiaries began until July  
 24 of 2015, was there any significant change in your  
 25 involvement in and relationship to those

30

1 BY MR. SCAROLA:

2 Q Can you give us any idea as to when it was?  
 3 A I think it was in the 2000s probably.

4 Q When did you communicate the instructions  
 5 for the payment of your granddaughter's high school  
 6 tuition?

7 A I don't know the date. I wouldn't know.

8 Q How old is your granddaughter now?

9 A Fifteen.

10 Q So she is only recently begun high school,  
 11 correct?

12 A Correct.

13 Q So it had to have been sometime within the  
 14 fairly recent past that you communicated those  
 15 instructions to make tuition payments for her,  
 16 correct?

17 A Yes. It was certainly not in the year 2000.

18 Q During the last session of your deposition,  
 19 you described your relationship to various business  
 20 entities and the extent of your involvement with  
 21 those businesses. You recall that testimony,  
 22 correct?

23 A Yes. Like Canopy and things like that, yeah.

24 Q Have you read the transcript of your  
 25 deposition?

32

1 subsidiaries?

2 MR. SAFRA: Objection to form.

3 THE WITNESS: I don't think so, but I  
 4 can't guarantee that.

5 BY MR. SCAROLA:

6 Q Would you agree that, at least as best you  
 7 are able to recall today, what you did, with respect  
 8 to the subsidiaries, remain substantially the same,  
 9 correct?

10 MR. SAFRA: Object to the form.

11 THE WITNESS: I think I explained at my  
 12 last discussion with you --

13 BY MR. SCAROLA:

14 Q Yes, sir. And I am just trying to make  
 15 sure --

16 MR. SAFRA: Let him finish his answer.

17 BY MR. SCAROLA:

18 Q I am just trying to make sure that there  
 19 weren't any significant changes during the period of  
 20 time from the time the subsidiaries began until July  
 21 of 2015.

22 A Not that I am aware of.

23 Q And the way you did what you did remained  
 24 the same during that period of time as well, correct?

25 MR. SAFRA: Objection to form.

1       THE WITNESS: Yes. I was a director.  
 2       I tried to, obviously, do the duty I had to  
 3       do for the shareholders.

4 BY MR. SCAROLA:

5       Q     Your relationship with Canopy did not  
 6 change, did it?

7       A     No.

8       Q     Your relationship with Rain Forest  
 9 Adventures (Holdings) did not change, did it?

10      MR. SAFRA: Objection to form.

11      THE WITNESS: I was -- my capacity was  
 12 director of Rain Forest Adventures  
 13 (Holdings), and that's been my role for many  
 14 years now.

15 BY MR. SCAROLA:

16      Q     So your relationship with Rain Forest  
 17 Adventures (Holdings) did not change from the time it  
 18 was formed through at least July of 2015, correct?

19      A     Yes, sir.

20      Q     In fact -- well, Canopy's relationship with  
 21 Rain Forest Adventures (Holdings) did not change  
 22 during that period of time, did it?

23      A     Well, Canopy Enterprises did not -- was  
 24 formed much later than, let's say, the subsidiaries of  
 25 Rain Forest, so it was much later.

1       Q     Yes, sir. From the time of its formation,  
 2 its relationship with Rain Forest Adventures  
 3 (Holdings) remained substantially the same throughout  
 4 that period of time, correct?

5       A     Well, let's say when it started, which I  
 6 don't know if it was started -- that relationship --  
 7 when it was founded or a little bit later. But  
 8 obviously I provided, as I told you, advice. And since  
 9 I am the sole owner of Canopy Enterprises, that was my  
 10 role and --

11      Q     Sole owner --

12      A     Of Canopy.

13      Q     Sole owner and sole employee?

14      A     Correct.

15      Q     And your relationship with Boston Capital  
 16 Ventures did not materially change at all from the  
 17 time of its foundation through at least July of 2015,  
 18 correct?

19      A     No, it did change in the sense that each  
 20 partnership had different partners. So every time a  
 21 new fund was started it was not necessarily with the  
 22 same partners. So in other words, we had different  
 23 partners.

24      Q     Yes, sir. But I'm talking about your  
 25 relationship with the funds. Your relationship with

1       the funds remained the same, correct?

2       A     I was a general partner in all the funds,  
 3 correct.  
 4       Q     EMJO's relationship with Canopy and Rain  
 5 Forest Adventures (Holdings) was unchanged during  
 6 that period of time from EMJO's foundation through  
 7 the formation of the subsidiaries, at least up until  
 8 July of 2015, correct?

9       MR. SAFRA: Objection, form.

10      THE WITNESS: EMJO never had any  
 11 relationship or any connection at all with  
 12 Canopy Enterprises. Zero. So that's not  
 13 correct.

14 BY MR. SCAROLA:

15      Q     Well, if it never had any relationship,  
 16 then the relationship never changed, right?

17      MR. SAFRA: Objection, form.

18      THE WITNESS: It was zero.

19 BY MR. SCAROLA:

20      Q     Remained zero throughout the entire period  
 21 of time?

22      A     Correct.

23      Q     So there were no changes in the  
 24 relationship between EMJO and Canopy because there  
 25 never was any. And the relationship between EMJO and

1       Rain Forest Adventures (Holdings) remained unchanged  
 2 up to July of 2015, correct?

3       A     They were -- as you know, EMJO was a passive  
 4 investor in Rain Forest Adventures (Holdings). That  
 5 did not change.

6       Q     In fact, there was no significant change in  
 7 what you did or the way you did it with respect to  
 8 the Rain Forest subsidiaries until June of 2016 when  
 9 you resigned from the board and your son took over,  
 10 correct?

11      A     That's correct.

12      Q     Who is Victor Gallo?

13      A     Victor Gallo? I don't know.

14      Q     Name doesn't mean anything to you?

15      A     No.

16      Q     In the earlier session of your deposition,  
 17 you described yourself as an advisor to EMJO and said  
 18 you followed up on investments on behalf of EMJO  
 19 after those investments were made. You remember that  
 20 testimony?

21      MR. SAFRA: Objection, form.

22      THE WITNESS: I didn't follow up on --  
 23 after the investments were made, with the  
 24 exception of when I was -- for example, in  
 25 the case of Rain Forest Adventures

1           (Holdings), EMJO was an investor, like  
 2           everybody else. So obviously I had to file  
 3           reports, which the board issued every  
 4           quarter for Rain Forest Adventures  
 5           (Holdings). And it was sent to all the  
 6           shareholders, including EMJO.

7           The same thing applied, for example, in  
 8           my capacity as general partner of Boston  
 9           Capital Ventures. They also sent to all the  
 10          investors for the limited partners, and they  
 11          sent quarterly reports.

12 BY MR. SCAROLA:

13        Q     I am going to hand you a page from what is  
 14        a rough transcript of your deposition -- the earlier  
 15        session of your deposition. I want you to read page  
 16        81, lines 5 through 12, which is a question and  
 17        answer that I just made reference to.

18        MR. SAFRA: While he's reading, Jack,  
 19        it is almost 47 minutes. I will let you  
 20        finish this line. Obviously I wasn't  
 21        interrupting that.

22        MR. SCAROLA: Thank you.

23        THE WITNESS: You said just review the  
 24        page?

25

1        BY MR. SCAROLA:

2        Q     Do you know any of the following people:

3        Dr. Donald Perry, Russell Barnaby or Victor Gallo?

4        A     I know the first two. I don't know the  
 5        third -- I can't -- I don't remember.

6        Q     You know Dr. Perry and Russell Barnaby; is  
 7        that correct.

8        A     Yes.

9        Q     Did you ever talk to them about your  
 10       involvement with the Rain Forest subsidiaries?

11       A     No. They knew I was working for the Rain  
 12       Forest Trams, and then I think the Rain Forest  
 13       Adventures (Holdings) came after they had -- they had  
 14       no more involvement in the company.

15       I think when they were involved it was  
 16       call Rainforest Aerial Trams.

17       Q     Did you ever misrepresent anything with  
 18       regard to your involvement in the Rain Forest  
 19       subsidiaries --

20       MR. SAFRA: Objection.

21 BY MR. SCAROLA:

22       Q     -- to either Dr. Perry or Russell Barnaby?

23       MR. SAFRA: Objection, form.

24       THE WITNESS: I don't think so.

25       MR. SCAROLA: All right. Thank you.

1        BY MR. SCAROLA:

2        Q     No, sir, the lines, which I think are lines  
 3        5 through 12.

4        A     Oh.

5        Q     That's a question -- one question and one  
 6        answer.

7        A     Uh-huh.

8        Q     Do you see where you have testified under  
 9        oath that you followed up on investments on behalf of  
 10       EMJO after those investments were made?

11       MR. SAFRA: Objection, form.

12       THE WITNESS: I follow up on those  
 13       investments as -- for example, in the case  
 14       of Boston Capital Ventures, I do it for  
 15       everybody. And the same thing I do for EMJO  
 16       as I would do for all the other investors.  
 17       I follow up on the investments after they  
 18       are made.

19       So I do it for everyone, not just for  
 20       EMJO. I mean, I don't sit there and do  
 21       reviews for EMJO. I have never done reviews  
 22       for EMJO.

23       MR. SCAROLA: I have one more question  
 24       I would like to ask.

25

1        MR. SAFRA: Let's take a break. I want  
 2        to see if I have anything.

3        THE VIDEOGRAPHER: Going off the  
 4        record. The time is 2:21 p.m.

5        MR. SAFRA: For the written record,  
 6        it's 50 minutes.

7        (A recess was had.)

8        THE VIDEOGRAPHER: Going back on the  
 9        record. The time is 2:27 p.m.

10       MR. SAFRA: Counsel for Royal Caribbean  
 11       on the telephone, do you have any questions?

12       MR. SEITZ: No.

13       MR. SAFRA: Counsel for Mr. Pierce and  
 14       AP Electrical?

15       MS. STRAUSS: We have no questions.

16       MR. SAFRA: We have no further  
 17       questions. We will read.

18       MR. SCAROLA: Thank you very much.

19       MR. SAFRA: Thank you.

20       THE VIDEOGRAPHER: Going off the  
 21       record. The time is 2:28 p.m.

22       - - -

23       (The deposition was concluded  
 24       at 2:28 p.m.)

25

41

1 CERTIFICATE OF OATH  
 2  
 STATE OF FLORIDA )  
 3 : SS  
 COUNTY OF PALM BEACH )  
 4  
 5 I, the undersigned authority, certify that  
 6 Harald Joachim von der Goltz personally appeared  
 7 before me and was duly sworn.  
 8 WITNESS my hand and official seal this 13th  
 9 day of March, 2017.

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Sonja D. Hall  
 Commission No.: FF 082994  
 Notary Public - State of Florida  
 My Commission Expires: 2-01-18

43

1 TO: Harald Joachim von der Goltz  
 2 c/o SCOTT COLE, ESQUIRE  
 COLE, SCOTT & KISSANE, P.A.  
 3 9150 South Dadeland Boulevard, Suite 1400  
 Miami, FL 33156  
 4  
 RE: LYNN MCCULLOUGH AND WILLIAM MCCULLOUGH  
 5 vs. ROYAL CARIBBEAN CRUISES, LTD.; RAIN FOREST  
 ADVENTURES (HOLDINGS) LTD.; ELITE SHORE EXCURSIONS  
 6 FOUNDATION; RAIN FOREST SKY RIDES, LTD.; RAIN FOREST  
 TRAM, LTD.; ET. AL.  
 7  
 8 At the conclusion of your deposition given  
 in the above-styled cause you indicated you wished to  
 9 read and sign the transcript.  
 10 This letter is to advise you that your  
 deposition is ready, and we ask that you call our  
 11 office at (561) 471-2995 at your earliest convenience  
 for an appointment to come in.  
 12  
 13 If you are a party in this action and your  
 attorney has ordered a copy of this transcript, you  
 may wish to read his copy and forward to us a  
 14 photostatic copy of your signed correction sheet.  
 15 It is necessary that you do this as soon as  
 16 possible, since the transcript cannot be held beyond  
 two weeks from the date of this letter.  
 17 If you have any reason which you would like  
 18 for me to place on your deposition as to your failure  
 to sign the same, please advise.  
 19 Thank you for your prompt attention.  
 20 Very truly yours,  
 21 PALM BEACH REPORTING SERVICE, INC.  
 22 1665 Palm Beach Lakes Blvd.,  
 23 Suite 1001  
 West Palm Beach, Florida 33401  
 24 BY: SONJA D. HALL  
 25 Date: March 13th, 2017

42

1 REPORTER'S DEPOSITION CERTIFICATE  
 2  
 3 STATE OF FLORIDA )  
 : SS  
 4 COUNTY OF PALM BEACH )  
 5 I, SONJA D. HALL, certify that I was  
 6 authorized to and did stenographically report the  
 7 deposition of Harald Joachim von der Goltz; that a  
 8 review of the transcript was requested; and that the  
 9 transcript is a true and complete record of my  
 10 stenographic notes.  
 11 I further certify that on the 13th day of  
 12 March, 2017, I notified SCOTT COLE, ESQUIRE that the  
 13 deposition of Harald Joachim von der Goltz was ready  
 14 for reading and signing by the witness.  
 15 I further certify that I am not a relative,  
 16 employee, attorney, or counsel of any of the parties,  
 17 nor am I a relative or employee of any of the parties'  
 18 attorney or counsel connected with the action, nor am  
 19 I financially interested in the action.  
 20 Dated this 13th day of March, 2017.

21  
 22  
 23 SONJA D. HALL  
 24  
 25

44

1 CORRECTION SHEET:  
 2 NAME: Harald Joachim von der Goltz  
 RE: LYNN MCCULLOUGH AND WILLIAM MCCULLOUGH  
 3 vs. ROYAL CARIBBEAN CRUISES, LTD.; RAIN FOREST  
 ADVENTURES (HOLDINGS), LTD.; ELITE SHORE EXCURSIONS  
 4 FOUNDATION; RAIN FOREST SKY RIDES, LTD.; RAIN FOREST  
 TRAM, LTD.; ET. AL.  
 5  
 6 The following corrections, additions or  
 deletions were noted on the transcript of the  
 7 testimony which I gave in the above-captioned matter  
 held on March 6th, 2017:  
 8  
 PAGE(S) LINE(S) SHOULD READ  
 9  
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 24 SIGNATURE: \_\_\_\_\_  
 25 DATE: \_\_\_\_\_

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>		
<p><b>able</b> 15:4 19:5 32:7</p> <p><b>above-captioned</b> 44:7</p> <p><b>above-styled</b> 43:8</p> <p><b>account</b> 8:1 9:1 17:21 21:9,10,17</p> <p><b>accountant</b> 22:19 23:15</p> <p><b>accounts</b> 7:24 20:15 20:15,19,22 21:3 21:13 23:9 25:15 26:11,18 27:24 28:13</p> <p><b>accuracy</b> 27:12</p> <p><b>accurate</b> 9:10,10,11 10:15 11:11,17 12:7 24:1,21 25:25 27:7,10,14</p> <p><b>action</b> 5:9 42:18,19 43:12</p> <p><b>additional</b> 6:10</p> <p><b>additions</b> 44:6</p> <p><b>Adventures</b> 1:9 2:13 13:5,13,16 13:20 31:16 33:9 33:12,17,21 34:2 35:5 36:1,4,25 37:4 39:13 43:5 44:3</p> <p><b>advice</b> 12:19 15:10 15:18 16:8,11 27:1 34:8</p> <p><b>advise</b> 43:10,18</p> <p><b>advisor</b> 9:8 16:7,9 23:1 25:18 27:3 28:5 36:17</p> <p><b>advisors</b> 15:9,19</p> <p><b>Aerial</b> 39:16</p> <p><b>agent</b> 24:11</p> <p><b>ago</b> 8:4 17:8 29:24</p> <p><b>agree</b> 10:2,8,13 22:7 32:6</p> <p><b>al</b> 1:11 43:6 44:4</p> <p><b>allow</b> 21:5</p> <p><b>allowed</b> 22:10</p> 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